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June 17, 2021

Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

**Re: Public Service Commission Review of South Carolina Code of Regulations Chapter
103 Pursuant to S.C. Code Ann. Section 1-23-120(J)
Docket No. 2020-247-A**

Dear Ms. Boyd:

I am writing on behalf of Lockhart Power Company (“LPC”) to provide input on the draft customer bill insert notice shared by Commission Staff on June 14, 2021. We have also reviewed comments submitted by Ms. Berkowitz on behalf of SC Appleseed Legal Justice Center and Mr. Terreni on behalf of SouthWest Water utilities.

LPC agrees with Mr. Terreni’s comments. Keeping customer bill insert notices to two pages or less is important not only to keep costs down, but also to ensure that notices will actually be read by customers. Additionally, we agree with changing “What does the company want” to “What is the company asking the PSC to approve.”

LPC also agrees with the spirit of Ms. Berkowitz’s proposed edits, *i.e.*, that customer bill insert notices should be simple and easy to understand, and believes most, if not all of the proposed edits, will make the bill insert more understandable to consumers. Customer notices should clearly convey (1) what the issue is; (2) how it may affect the consumer; and (3) how the consumer can participate or find out more detailed information about the matter.

We do have a concern with attempting to explain the role of the Commission in simplistic terms. The Commission does so much more than “watch over” certain businesses. Ms. Berkowitz’s suggestion – *i.e.*, putting up front that the Commission decides what rates a utility can

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charge – is a good substitute for the “Who is the PSC” section, because it is more specific to what the Commission will do in the particular matter at issue.

At the same time, while it is important not to be too simplistic, we would caution the Commission about trying to put too much detail and basic information in these notices. It is not the purpose of a notice to explain the relative functions and roles of the Commission, ORS, and the Department of Consumer Affairs; to explain what a rate case is, or to provide other general background information. The contact information provided in the draft notice will go a long way toward helping consumers who seek access to that kind of information. We believe it is important that notices be as brief as possible, while clearly conveying the basic information set forth above in a direct manner to consumers.

Thank you for the opportunity to provide this input.

Very truly yours,

BURR & FORMAN LLP

/s/ Margaret M. Fox

Margaret M. Fox

MMF/khh

cc: All Parties of Record